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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JIN MYUNG, an individual; DEREK  
KINOSHITA, an individual;

Plaintiffs

v.

RESPECT, LLC, a Nevada limited  
liability company; COLONIAL VAN  
LINES d/b/a MOVING VAN LINES,  
a foreign corporation;

Defendants

Case No.: 2:24-cv-02182-CDS-NJK

**STIPULATION TO EXTEND  
TIME TO FILE OPPOSITIONS  
TO DEFENDANT COLONIAL  
VAN LINES' MOTION FOR  
PARTIAL SUMMARY  
JUDGMENT AND MOTION  
FOR SUMMARY JUDGMENT**

[ECF No. 32]

Plaintiff JIN MYUNG and Plaintiff DEREK KINOSHITA (collectively  
"Plaintiffs"), by and through their counsel RYAN A. HAMILTON, ESQ., of  
HAMILTON LAW, and Defendant COLONIAL VAN LINES (hereafter "CVL"),  
by and through its counsel CRAIG D. SLATER, ESQ., of LUH & ASSOCIATES,  
stipulate and agree to extend the current deadline of June 30, 2025, for

1 Plaintiffs to file their oppositions to Defendant CVL's Motion for Partial  
2 Summary Judgment (ECF No. 30) and Motion for Summary Judgment (ECF  
3 No. 31), by four days to and including, July 4, 2025.

4 1. On June 9, 2025, Defendant CVL filed a Motion for Partial  
5 Summary Judgment (ECF No. 30).

6 2. On June 9, 2025, Defendant CVL filed a Motion for Summary  
7 Judgment.

8 3. Federal Rules of Civil Procedures 6(b) and Local Rule IA 6-1  
9 impose a good cause standard to extend the deadline file an Opposition.

10 "Good cause is a non-rigorous standard that has been construed broadly  
11 across procedural and statutory contexts." *Ahanchian v. Xenon*  
12 *Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010).

13 4. Good cause exists to extend the deadline for Plaintiffs to file their  
14 Opposition by four days as counsel for Plaintiffs has been locked into trial  
15 for the last two weeks and trial is continuing into next week. In addition,  
16 counsel for Plaintiffs has a Ninth Circuit deadline that will not allow for  
17 further extensions.

5. Neither party will suffer any prejudice from an extension of time.

DATED this 20th day of June 2025.

DATED this 20th day of June 2025.

/s/Ryan A. Hamilton

/s/Craig D. Slater

Ryan A. Hamilton, Esq.  
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Colonial Van Lines*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

Dated: June 27, 2025